

BEFORE THE POSTAL RATE COMMISSION
WASHINGTON, DC 20268

In the matter of:

Holman Post Office, New Mexico, 87723

Docket Number 1367246-87723901

PRC Docket A-2012-18

Jack A Rains, Petitioner

PARTICIPANT STATEMENT

1. Petitioners are appealing the Postal Service's Final Determination concerning the Holman Post Office. The Final Determination was posted on September 26, 2011.
2. In accordance with applicable law, 39 U.S.C. 404(d)(5), the Petitioner requests the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination.
3. Petitioners: Please set out below the reasons why you believe the Postal Service's Final Determination should be reversed and returned to the Postal Service for further consideration. (See pages of the Instructions for an outline of the kinds of reasons the law requires us to consider.)

BELOW IS THE STATEMENT OF JACK A RAINS

Docket No: A-2012-18

Holman, NM Post Office 87723

Dear Sirs,

I appeal the decision to close the Holman, NM Post Office on the grounds that the study of effect on the community as required by 39 U.S.C. 404(d)(2)(A)(i) was not actually considered. I believe that the decision to close was made, and then the Post Office simply did a pro-forma evaluation using frequently erroneous Internet sources and canned responses to client concerns. I will cite some examples.

1. The demographic data came from a web page, *Sperlings BestPlaces*, a copy of which is included in the Administrative Record, page 27. This lists the population as 3,438. If someone had been actually studying community effects, they might have wondered how a level 11 Post Office with 152 rented boxes satisfied the needs of over three thousand people.
2. Some data was taken from Google Maps, Administrative Record, page 6. The location of the Post Office is about a quarter mile from where indicated.
3. Three pictures of Holman are used in the Administrative Record, pages 10, 11 & 12, seemingly to tick the box that some requirement was filled. They are not typical of the area, do not show any relationship to the actual Post Office such as access and are not cited in the report.
4. The Post Office suggested that people can leave a note for the contract carrier to honk to complete a transaction. Only twenty-three residences are within earshot of the highway. On

warm days, with windows open, you might be able to add another half dozen. Again, no realistic appraisal of the real situation was made.

5. This is an "Enterprise Zone" in a federally designated "Distressed Area". Nowhere in the documents is the impact on the existing small businesses in a poverty area addressed.
6. A list of small businesses was provided in the Final Determination together with a note that many questionnaires listed "no businesses". There was no attempt to reconcile this discrepancy. The fact is, that there are no "store-front" businesses, but a number of home-based businesses, several of whom are totally dependent on the Postal service.
7. In the Final determination, item #58 concerning snow removal, we were assured that the highway department snowplow would give access. In reality this gives access to the location, but piles of snow along the shoulder make it difficult to get out of the traffic lane to climb to the box. This is not a metropolitan area like Washington with dump trucks hauling away the snow.
8. Peripheral services such as a bulletin board could have been dismissed with a "Sorry, but that is not a Post Office obligation". Brusque but honest. Suggesting use of the fire department, which is an unmanned, normally locked volunteer station four miles away or the Head Start school with entry controlled for security reasons is just another proof that the Post Office did not try to do a genuine community impact study.
9. The data sheet used in the Administrative Record, pages 8, still lists the previous Postmaster (and her home phone for emergencies) over a year after her death. This is an indication that the closure file was already being prepared before the evaluation was complete.

In conclusion, it seems clear that no realistic study of the effect on the community was even attempted, beyond someone looking us up on the internet, and a public meeting telling us that service to a CBU was an improvement over an attended post office. There are many other issues, such as the high percentage of seniors; such as ignoring alternative solutions; such as lack of a detailed fiscal analysis. These have been detailed in the initial appeals and need to be addressed when the Post Office does an actual community effect study.

Jack A Rains